

**From:** Cynthia Caporale/ESC/R3/USEPA/US  
**Sent:** 4/6/2012 2:32:47 PM

**To:** [Ex. 4 - CBI]@lmco.com>  
**CC:** [Ex. 4 - CBI]@lmco.com>; Gary Newhart; John Gilbert; Kelley Chase;  
[Ex. 4 - CBI]@lmco.com>; [Ex. 4 - CBI]@lmco.com>; [Ex. 4 - CBI]  
[Ex. 4 - CBI]@lmco.com>; "Robin Costas"<Costas.Robin@epamail.epa.gov>; "Ed Messer"  
<Messer.Ed@epamail.epa.gov>; Stevie Wilding  
**Subject:** Re: Verification/Completeness Check for Dimock (R3 WO 1202003 PART 3 Posted Mar 15 and R3 WO 1202004 PART 3 Posted Mar 19)

The report on the Dimock Verification/Completeness Check for file 1202003 FINAL Part 3 of 3 R33907 03 14 12 1314.pdf and 1202004 FINAL Part 3 of 3 R33907 were reviewed and below are the responses for your consideration.

File 1202003 FINAL PART 3 of 3 R33907 03 14 12 1314.pdf

1. The method blank for TDS exceeded the RL at 20 mg/L. The following qualifiers are recommended for the TDS analysis based on the results of the method: Elevate the RL to 20 mg/L for samples HW45, HW45-P, HW43-P, HW43, EB02, HW15a-P, HW31-P, HW30, HW30-P, HW31, FB11, HW31z, HW15a, HW38-P, FB13, FB12, Hw47, Hw51, HW38, HW51-P and HW47-P. For all samples listed above with the exception of EB02 and FB11, enter a "J" flag in the result qualifier column. This is due to the sample results being within 10 times the RL (between 20 and 200 mg/L).

**Response:** Region 3 Data Validation Procedures include criteria for qualifying samples based on field blanks. According to Region 3 procedures results that are 5x or 10x below the amount found in a field or method blank are qualified "B." Since the "B" qualifier is not being used for this project, we highly recommend the quantitation limit be raised and qualified as "U." Retaining the value and qualifying "J" is not recommended for the data use involved with the project as it tends to cause confusion as to the presence of a compound or constituent when really the value was due to blank contamination.

2. For total nitrogen, the MS recovery for sample HW15a-P (lab #1202003-13) exceeded the 85-115% criterion. Since it cannot be ascertained if all the samples in the batch are sufficiently similar, this reviewer agrees with the "J" flag assigned by the laboratory. A "UJ" flag needs to be entered into the result qualifier column.

**Response:** We agree with this statement.

3. For oil and grease analyzed under batch BB22801, the LCS, MRL check and the MS recovery for sample HW30-P (lab #1202003-16) were all below the respective acceptance criteria. This reviewer agrees with the lab qualifier of "UJ". Non-detect results for HW45, HW45-P, HW43-P, HW43, EB02, HW15a-P, HW31-P, HW30, HW30-P and HW31 should be flagged "UJ" in the result qualifier column.

**Response:** We agree.

4. It is assumed that all required instrument QC in the method was run and was within the criteria listed in the EPA R3 SOPs since this information is not available in the laboratory report.

**Response:** This assumption is correct.

The report on the Dimock Verification/Completeness Check for file 1202004 FINAL Part 3 of 3 R33907 03 19 12 1254.pdf was reviewed and below are the responses for your consideration.

File 1202004 FINAL PART 3 of 3 R33907 03 19 12 1254.pdf

1. The field blanks from 2/8/12 (FB13) and 2/9/12 (FB14) had TDS results of 154 and 60 mg/L over the 10 mg/L RL. Since inorganic data are not typically qualified non-detects "U" based on field blank results, results for samples collected on 2/8/12 and 2/9/12 should be qualified estimated "J". A "J" qualifier should be entered into the result qualifier column in Scribe for samples HW48, HW48z, HW21, HW21z, HW23-P, HW22, HW23, HW22-P, HW49, HW44 and HW49-P.

**Response:** Region 3 Data Validation Procedures include criteria for qualifying samples based on field blanks. According to Region 3 procedures results that are 5x or 10x below the amount found in a field or method blank are qualified "B." Since the "B" qualifier is not being used for this project, we highly recommend the quantitation limit be raised and qualified as

"U." Retaining the value and qualifying "J" is not recommended for the data use involved with the project as it tends to cause confusion as to the presence of a compound or constituent when really the value was due to blank contamination.

2. For total nitrogen, the MS recovery for sample HW44 (lab #1202004-28) exceeded the 85-115% criterion. Since it cannot be ascertained if all the samples in the batch are sufficiently similar, this reviewer agrees with the "J" flag assigned by the laboratory. A "J" flag needs to be entered into the result qualifier column.

**Response:** We agree.

3. For total phosphorous, the MS recovery for sample HW36n (lab #1202004-21) exceeded the 69.9-121.9% criterion. Since it cannot be ascertained if all the samples in the batch are sufficiently similar, this reviewer agrees with the "J" flag assigned by the laboratory. A "UJ" flag needs to be entered into the result qualifier column.

**Response:** We agree.

4. For oil and grease analyzed under batch BC20101, the LCS, MRL check and the MS recovery for sample HW-22 (lab #1202003-13) were all below the respective acceptance criteria. Likewise for batch BC20701, the MRL check was below the criterion of 60-140%. This reviewer agrees with the lab qualifier of "UJ" for both batches. Non-detect results for HW48, HW48Z, HW21, HW21Z, HW23-P, HW22, HW23, HW22-P, HW36n, HW49, HW16-P, HW54-P, FB14, HW16Z, HW16, HW44, HW49-P, HW36n, FB15 and HW54 should be flagged "UJ" in the result qualifier column.

**Response:** We agree.

5. It is assumed that all required instrument QC in the method was run and was within the criteria listed in the EPA R3 SOPs since this information is not available in the laboratory report.

**Response:** This assumption is correct.

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Cc: John Gilbert/CI/USEPA/US@EPA, Gary Newhart/CI/USEPA/US@EPA, Ex. 4 - CBI @lmco.com>, Ex. 4 - CBI @lmco.com>  
Date: 03/21/2012 03:12 PM  
Subject: Verification/Completeness Check for Dimock (R3 WO 1202003 PART 3 Posted Mar 15 and R3 WO 1202004 PART 3 Posted Mar 19)

.....is attached for your review and consideration.

Ex. 4 - CBI

Lockheed Martin  
Scientific, Engineering, Response and Analytical Services (SERAS)

Ex. 4 - CBI

[attachment "SERAS-172-DSR-032112\_31.docx" deleted by Cynthia Caporale/ESC/R3/USEPA/US]